



HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NEW YORK 10007

**PATRICIA MILLER**  
Division Chief  
pmiller@law.nyc.gov  
Phone: (212) 356-3500  
Fax: (212) 356-1148

**By ECF**

September 5, 2023

Honorable Colleen McMahon  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,  
No. 20 Civ. 8924 (CM) (GWG)  
This filing is related to all cases

Your Honor:

I am the Division Chief of the Special Federal Litigation Division in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York. Defendants, the plaintiffs in the *Payne*, *People*, *Gray*, and *Rolon* matters, as well as the Sergeants Benevolent Association (“SBA”) and Detectives Endowment Association (“DEA”) Union Intervenors, collectively defined as the Parties, now jointly file the following documents:

- Joint Motion to Dismiss with Prejudice and Retain Jurisdiction;
- Memorandum in Support of Parties’ Joint Motion; and
- Proposed Order to Dismiss with Prejudice and Retain Jurisdiction; with attached Proposed Stipulated Order Pursuant to Fed. R. Civ. P. 41(a)(2) as Exhibit A.

The Parties now jointly respectfully request that the Court endorse the above-detailed documents.

In addition, the Plaintiffs in *Payne*, *Gray*, and *Rolon*, have also reached settlements in principle with Defendants concerning their individual monetary damages in those cases; stipulations for those claims will be filed within forty-five (45) days.

Finally, the Parties will soon jointly file: (1) A Proposed Standing Order for the unsealing of certain records that might otherwise be sealed pursuant to New York Criminal Procedure Law (“CPL”) §§ 160.50 and/or 160.55; and (2) a Proposed Confidentiality Stipulation and Order. Both items will be needed as part of the Collaborative Process outlined in Exhibit A *supra*.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Patricia Miller', with a stylized, wavy line for the surname.

Patricia Miller  
*Division Chief*  
Special Federal Litigation Division

cc: ALL COUNSEL (*via* ECF)